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Before The POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

PUBLIC INQUIRY CONCERNING THE TERMS OF 39 U.S.C. § 404(d)

Docket No. PI2016-2

UNITED STATES POSTAL SERVICE MOTION FOR LEAVE TO FILE AN OPPOSITION TO THE MOTION OF ELAINE MITTLEMAN SEEKING TO SUPPLEMENT THE RECORD (April 25, 2016)

The United States Postal Service (Postal Service) respectfully requests leave to file a pleading in opposition to Commenter Elaine Mittleman's Motion to Supplement the Record in the above-captioned docket. In her motion, Ms. Mittleman provides comments regarding the Postal Regulatory Commission's jurisdiction under 39 U.S.C. § 404(d) and its decision regarding the Pimmit Branch facility. Given the substance and intent of the motion, a brief rejoinder by the Postal Service is warranted.

The Postal Service does not consider that any party will be prejudiced by its submission of a pleading in opposition to her motion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

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